

MND 985716 554

Attn: Lorna M Jereza Chief Enforcement / Compliance Assurance Branch Sect. 1
Robert Dean Smith Inspector

Below is our response to your letter regarding our inspection on October 18, 2005 by inspector Robert Dean Smith. We have read the letter and have no disagreements with your findings. We have corrected the items as requested and have implemented the following plans to improve our Hazardous Waste Program at Alamco Wood Products.

In reference to item #1 (ensuring a copy of the manifest was sent to the MPCA and received). Alamco will mail all documents with return receipt requested.

In reference to item #2 (submitting an exception report). Alamco has contacted the end facility about this matter and informed them of the timeline regarding the copies of the manifest. Alamco will also place a call to the end facility after 15 days if we have not yet received the copy 3 manifest. At that time Alamco will inquire about the manifest to make sure we receive it within the specified time. If for some reason that Alamco does not receive the manifest copy from the facility within the specified time we *will* submit an exception report to the MPCA.

In reference to item #3 (changes in contingency plan). Alamco has made the required changes as per your request to our contingency plan. Alamco will update our contingency plan as changes in our workplace arise. We have setup a revision page in the manual that will entail all changes made to the manual along with the date of those changes. The contingency plan will be inspected annually even if there are no changes in the workplace. This annual inspection of the contingency plan will also be documented on the revision page of the contingency plan. Alamco will continue to forward current copies of the contingency plan to our local police and fire departments as required.

In reference to item #4 (marking of used oil containers with the words "used oil"). We have changed the labeling to "used oil" and have informed our maintenance department that this is the only approved label for used oil. The labels will also be inspected periodically to ensure they are legible and securely attached to the containers.



John Forman
Vice President and Technical Director



Lane Vanek
Safety Compliance Coordinator



RTC

Facility Name : Alamo Co Wood Products

Facility Location: 1410 West 9th Street

City: Albert Lea ~~MS~~ State: MN

U.S. EPA ID# MND 080 773341 2 MN ANG 3

Assigned Staff: SMITH Phone: 67568

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's. 31/31
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

02 FEB 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lane Vanek
Environmental Manager
Alamco Wood Products, Inc.
1410 West 9th Street
Albert Lea, MN 56007

Re: Notice of Violation
Alamco Wood Products, Inc.
EPA ID No.: MND 985 716 554

Dear Mr. Vanek:

On October 18, 2005, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Alamco Wood Products, Inc.'s (Alamco) facility located at 1410 9th Street, Albert Lea, Minnesota. The purpose of the inspection was to evaluate Alamco's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by Alamco personnel, review of records, and personal observations made by the inspector at the time of the investigation, the U.S. EPA has determined that Alamco was in violation of certain requirements of the Minnesota Rules (Minn. R.) and United States Code of Federal Regulations (CFR). We find that Alamco was in noncompliance with the following conditions for an exemption from the requirement to obtain a hazardous waste storage permit ("permit exemption"), and in violation of the following requirements:

1. A large quantity generator who sends hazardous waste to an out-of-state facility must ensure that a copy of the hazardous waste manifest is sent to the Minnesota Pollution Control Agency (MPCA) within 40 days of acceptance by the out-of-state facility. Minn. R. part 7045.0265, subp. 4, A. At the time of the inspection, Alamco had received copies of two manifests, manifest no. MN351647, dated by

the generator on 08/10/05 and accepted by the facility on 08/11/05, and manifest no. MN359486, dated by the generator on 09/06/05 and accepted by the facility on 09/07/05; however, Alamco had no records to indicate that it had ensured that MPCA received copies of these two manifests within 40 days of acceptance by the facility. Therefore, Alamco violated the above-referenced generator requirement. On October 18, 2005, Alamco provided evidence that Alamco sent the copies of the two manifests to the MPCA on October 18, 2005

2. A large quantity generator must submit an exception report for manifests that are not received back from the receiving facility within 45 days of the date the receiving facility accepted the hazardous waste shipment. See Minn. R. part 7045.0298 [40 CFR § 262.42]. During the inspection, the inspector observed that Alamco had not documented the submission of an exception report for one manifest, MN351647, which was dated by the generator on 08/10/05 and which was accepted by the receiving facility on 08/11/05 but for which Alamco had not yet received a copy from the accepting facility. Since more than 40 days had elapsed since the waste had been accepted, Alamco was required to submit an exception report to MPCA. Alamco therefore violated the above-referenced generator requirement. Subsequent to that observation, on October 18, 2005, Alamco provided evidence that Alamco had sent the copy of the manifest to MPCA with the exception report on October 18, 2005.
3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using containers to store hazardous waste must comply with the requirements of Minn. R. 7045.0292 subp 1 G, which requires compliance with, among other things, Minn. R. parts 7045.0566 to 7045.0576. See Minn. R. part 7045.0292, subp. 1 G which requires compliance with Minn. R. parts 7045.0566 to 7045.0576 [40 CFR 262.34 (a) (4) which requires compliance with 40 CFR 265 subparts C and D]. Minn. R. parts 7045.0568 to 7045.0576 also apply to owners and operators of hazardous waste storage facilities, under Minn. R. part 7045.0572 subp. 1 [40 CFR §§265.30 and 265.50]. Under Minn. R. part 7045.0572, subp.2 [40 C.F.R. §265.51(a)], a large quantity generator that stores hazardous waste, and the owners and operators of hazardous waste storage facilities, must have a contingency plan. Minn. R. part 7045.0572, subp. 6 [40 C.F.R. §265.54(c)] requires that the contingency plan be amended if the facility makes certain changes that materially increase the potential for fires, explosions, or the release of hazardous waste or hazardous waste constituents or the response necessary in an emergency. During the inspection, the inspector observed that Alamco had not modified its contingency plan to omit information on waste acid which Alamco had not generated in several years. The failure to make this change affects the response necessary in an emergency. Alamco therefore failed to comply with the above-mentioned condition for a permit exemption. Subsequent to the observation, Alamco supplied information demonstrating compliance with the above-mentioned condition for a permit exemption on December 9, 2005.

4. A used oil generator must clearly label or mark containers used to store used oil with the words, "Used Oil." See Minn. R. 7045.0855 subp. 2, C [40 CFR 279.22(c)]. During the inspection, the inspector observed that Alamco had not marked three 55-gallon drums of used oil with the words, "Waste Oil." Alamco, therefore failed to comply with the above-mentioned used oil requirement. Alamco supplied information proving compliance with the above-mentioned requirement on October 18, 2005.

At this time, U.S. EPA is not requiring Alamco to submit an application for a RCRA hazardous waste storage permit, so long as it maintains compliance with the requirements found to have been violated during the October 18, 2005, inspection. According to Section 3008(a) of RCRA, U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to maintain compliance with the above conditions and requirements.

If you have any questions or concerns regarding this matter, please contact Robert Dean Smith, of my staff, at (312) 886-7568.

Sincerely,



Lorna M. Jereza, Chief
Enforcement and Compliance Assurance Branch
Compliance Section 1

cc: Robert Dullinger, MPCA

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece or on the front if space permits.

1. Article Addressed to:

LANE VANER
ENVIRONMENTAL MANAGER
ALAMCO WOOD PRODUCTS INC
1410 WEST 9TH STREET
ALBERT LEA MN 56007

2. Article Number
(Transfer from service label)

7001 0320 0006 1449 0630

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature of Agent or Addressee

Address different from item 1? ☐ YesDelivery address below: ☐ No

3. Service Type

- | | |
|--|--|
| <input checked="" type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |

4. Restricted Delivery? (Extra Fee) ☐ Yes

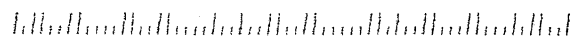
UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
Attn: Robert Smith DE-9J





Waste, Pesticides and Toxics Division

Type of Document: ☐ SNC Determination Memo
☒ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☒ State Notification of Enforcement Action

Facility Name: Alamco Wood Products, Inc.

Facility Location: 1410 West 9th Street

City: Albert Lea State: MN

U.S. EPA ID# MND ~~175-34~~ 985 716 554

Assigned Staff: SMITH Phone: 6-7568

Name	Signature	Date
Author	<i>Robert Alan Smith</i>	<i>12-07-05</i>
Regional Counsel	<i>Padma Bending</i>	<i>12/10/06</i>
ORC Section Chief	<i>—</i>	
ECAB Section Chief	<i>Laura M. Jensen</i>	<i>01/30/06</i>
ECAB Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Alamco Wood Products, Inc.

EPA ID No.: MND 985 716 554

LOCATION ADDRESS: 1410 West 9th Street
Albert Lea, MN 56007

NAICS CODE: 321114

DATE OF INSPECTION: October 18, 2005

EPA INSPECTOR: Robert Dean Smith, LPG

PREPARED BY:

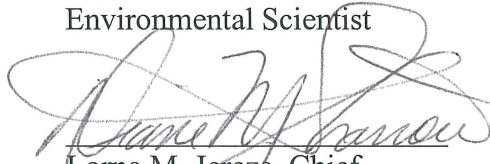


Robert Dean Smith, LPG
Environmental Scientist

12-0705

Date

REVIEWED BY:



Lorna M. Jereza, Chief
Compliance Section 1

12/9/05

Date

Enforcement and Compliance Assurance Branch

Purpose of Inspection:

The purpose of the inspection was to conduct a Compliance Evaluation Inspection (CEI) at the installation for management of its RCRA regulated waste. On October 18, 2005, I conducted an inspection of the installation.

Participants:

Robert Dean Smith, LPG was the EPA Region 5 WPTD inspector assigned to this installation. Representing Alamco Wood Products, Inc. was Lane L. Vanek and John L. Forman, VP Sales/Technical Director. Claire I. Vermedahl, CEO/CFO also was present during portions of the inspection.

Facility Description:

Alamco Wood Products, Inc. (Alamco) is located on the southern edge of Albert Lea, Minnesota. Alamco is a completely independent company since being purchased from Weyerhaeuser in 1982 by Mr. Vermedahl. The Alamco plant has been in this location since 1951. About 95 employees work at this plant. About 65 people work the first shift starting at 6:00AM and about 30 people work the second shift starting at 12:30 PM.

Alamco does not treat wood but instead, manufactures wood products that may be made from wood treated by other companies. Alamco produces structural forms. The forms are used in churches, motels, park shelters, bridges, radio/communication towers, and fertilizer buildings. Some of these uses require treated wood so that the structures can either survive the natural elements or corrosive atmospheres such as in the fertilizer buildings. Alamco has about 60 customers and about 12 of them are major customers. All work is custom work.

Alamco does not treat wood, however, does utilize treated wood for some of its products. Hazardous waste is generated by the sanding or working of the surface of the treated wood. The hazardous waste is generated by sanding, is transported via vacuum to a baghouse where the wood dust is processed and placed into 55 gallon drums. The 55 gallon drums are stored in the same building where the hazardous waste is transported via ductwork under vacuum and placed into the 55 gallon drums.

Facility Inspection and Observations:

Mr. Vanek, Mr. Forman, and I walked to the shed where the hazardous waste is transported, via ductwork under vacuum, and then placed into 55-gallon drums. The hazardous waste is either in the form of sawdust or in finer dust from sanding. The hazardous waste wood particles are compressed and then placed into the 55-gallon drums. At the time of the inspection, I observed 17 pallets of drums plus an additional drum stored in the shed. Four drums were on each pallet for a total of 69 drums.

I reviewed the hazardous waste accumulation area inspection checklist logbook that was present

in the shed. All inspections were conducted and appropriate notations were made in the log.

We then proceeded to the manufacturing area where all wood is worked and formed into finished products. The wood is graded before use. Each product has its needs for quality of wood or type of wood. The wood is gathered for the job and sized and brought together for gluing and if necessary, bent and formed into the proper shape. If necessary, the wood is sanded on the sides and this is where the hazardous waste is generated in the case of treated wood. The wood forms go through the sanders which have a vacuum system that removes the saw dust from the plant. The ductwork then takes the saw dust to the baghouse.

Later Mr. Vanek and Mr. Forman and I went to the maintenance building.

Paperwork review

Most of the facility's paperwork was found in a three ring binder. The contingency plan, employee training documents, and hazardous waste determinations were in this binder. Hazardous waste manifests were separately stored from the binder as was the inspection checklists.

The contingency plan was adequate, however, an error was discovered. The plan discusses "waste acid" and when the use of acid was examined, I was informed that acid had been used in the past for a process no longer in operation and that the information is out of date. I suggested that the changes be made.

I found that the employee training records were in order. Only two employees manage hazardous waste, Dan Christensen and Kevin Davis. I identified no issues.

I discovered that two hazardous waste manifests did not have the original copy attached with signatures. Mr. Vanek could not locate the two manifests at the time of the inspection.

Alamco generates wood dust/cuttings from pressure treated wood. I found that Hoover Treated Wood Products, Inc. (Hoover) from Pine Bluff, Arkansas, supplies treated wood to Alamco. I reviewed a brochure that states that Hoover treats its wood with Chromated Copper Arsenate (CCA), Ammonical Copper Arsenate (ACA), and Ammonical Copper Zinc Arsenate (ACZA). I found that the hazardous waste determinations were without issue.

I reviewed the less than 90-day hazardous waste storage area inspection logs. The logs are in order.

Post Inspection Briefing:

I discussed my findings with Mr. Vanek and Mr. Forman. I stated that Alamco needs to find the misplaced hazardous waste manifests. I also stated that the contingency plan must be updated to remove any reference to waste acid and that the new contingency plan would need to be submitted to the police department, fire department, hospital as necessary for the needs of the

company. I also stated that Alamco would need to send the new contingency plan with a return receipt so that Alamco would have proof that the contingency plan was sent to these entities. I also stated that all issues were identified during the post-inspection conference, however, upon reviewing my notes in the office, other issues may come up which would be addressed in a letter.

Attachment:

1. Photographs
2. Checklist

PHOTOGRAPH LOG

Photo 1: Waste mineral spirits solvent in satellite accumulation.

Photo 2: Used oil labeled as “waste oil”.



Photo 1: Waste mineral spirits solvent in satellite accumulation.



Photo 2: Used oil labeled as "waste oil".



MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

I. GENERAL INSPECTION INFORMATION

Site Name: <u>Alamo</u>	EPA ID Number: <u>MND 985 716 554</u>
Address: <u>1410 W. 9th Street</u>	Waste Activity: <u>LAG</u>
City: <u>Albert Lea</u>	Zip/9 Digit: <u>56007</u>
County:	District:
	Waste generated per month
Current Number of Employees: <u>95</u>	Years in Business or Date Company Started: <u>50+</u>
Date of last MPCA Hazardous Waste Inspection: _____	
Inspection Date: <u>10/18/05</u>	Time: From <u>10:10</u> to <u>1:00</u>

LEAD INSPECTOR:

Phone #

Robert Dean Smith

312 886 7568

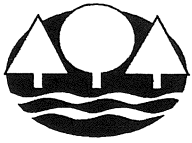
Other People present: (name, title, organization)	Phone #
<u>Lane L. Vanek Manager, ENV.</u>	<u>507 373-1401</u>
<u>John L. Forman V.P. Sales/Tech Div</u>	<u>507 373-1401</u>
<u>Claire I. Vermedahl</u>	<u>507 373-1401</u>

Company Products or Services:

II. LICENSING/IDENTIFICATION/PERMITS

IDENTIFICATION - WASTE TABLE

Waste Name/Code	Quantity Generated in (last year)	Changes



MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	1h	
7045.0568 3	If the company was unable to make arrangements with local authorities, have they documented the attempts?	X	



**MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST**

IN - Alamo re

G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	NO	<i>one manifest</i> <i>Alamo received Manifest but MPCA did not get a copy until 10/18/05</i>
7045.0302 1	If company exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc.)	X	

G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 2	Does the company have a hazardous waste program director trained in hazardous waste management procedures?	IN	
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training programs?	IN	
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	IN	
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	IN	
7045.0558 6, D	Has the company kept records that document that the initial training and annual review training has been given?	IN	
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	IN	
7045.0558 6, A	Does the company maintain training records which include a job title for each position at the facility related to hazardous waste?	IN	
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	IN	
7045.0558 C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	IN	



**MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST**

G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	IN	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to company personnel?	IN	
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders.	IN	
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	IN	
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment)?	IN	
7045.9566 4	Is emergency equipment tested and maintained?	IN	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc.)?	IN	
7045.0275 2	If the company had a release to the environment, did the company immediately notify the agency?	IN	
7045.0275 3	If the company has had a release, did the company recover as rapidly and as thoroughly as possible, any hazardous waste that has leaked, spilled, or otherwise escaped a container?	IN	

G1: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	IN	
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	IN	



**MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST**

G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 8	e. For contaminated soil of which the company has applied alternative treatment standards has the company included the constituents subject to treatment, and the statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with the soil treatment standards as provided by 268.49 (c) of the universal treatment standard.	X	
268.7 (a), (3), (i)	For all hazardous waste that does meet treatment standards at the point of generation, has the company sent a one-time notification with signed certifications to the receiving TSD and kept a copy in its file?	1h	
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3), item 1	For all waste that does meet treatment standards, do notifications contain the following: a. All applicable EPA waste codes and manifest number?	1h	
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3), item 9	b. Certification statement	1h	
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4), item 1 4	For waste or contaminated soil that are subject to exemptions, does the notification contain: a. All applicable EPA waste codes; b. Manifest number?	1h	



**MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST**

7045.1315 1, B,1,c	c. Manifest number?	X	
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MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

7045.0270 5	Prior to transport, have the applicable warning labels been placed on each package in accordance with US DOT regulations?	14	
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**MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST**

G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0685 2, B,1	Are spend lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries AND is the containment area covered to prevent precipitation run on?	✓	
7060.0600 2	Has the company discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	✓	
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	OUT	marked "waste oil"
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	✓	
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	✓	
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	✓	
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	✓	

Lorna Jereza/R5/USEPA/US

01/31/2006 10:07 AM

To MPCA

cc Robert Smith/R5/USEPA/US, Joseph Boyle/R5/USEPA/US

bcc

Subject Enforcement Action Communication- Alamco Wood
Products, Inc. (NOV)

This is to inform you that on February 2, 2006, U.S. EPA will send by certified mail, the attached notice of violation (NOV) to Alamco Wood Products, Inc. (Alamco) located in Albert Lea, MN. The alledged violations were found during U.S. EPA's October 18, 2005, compliance evaluation inspection of Alamco.

Contact: Robert Dean Smith, (312) 886-7568



Alamco NOV 206.rtf

Joseph Boyle /R5/USEPA/US

01/09/2006 11:09 AM

To Padmavati Bending/R5/USEPA/US@EPA

cc Lorna Jereza/R5/USEPA/US@E steve, Robert
Smith/R5/USEPA/US@EPA

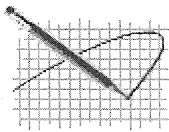
bcc

Subject Re: Alamco NOV 

Please remove */Return to compliance* from the caption before you mail the letter.

Thank you

Padmavati Bending/R5/USEPA/US




Padmavati
Bending/R5/USEPA/US

01/09/2006 09:06 AM

To Robert Smith/R5/USEPA/US@EPA

cc Joseph Boyle/R5/USEPA/US@EPA, Lorna
Jereza/R5/USEPA/US@E steve

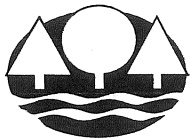
Subject Alamco NOV 

Bob - attached is the NOV with my changes. This looks good to go out to me. - pgb



NOV_RTC_MNAlamco.pgb010906.doc

Padmavati G. Bending
Associate Regional Counsel
U.S. EPA, Region 5, ORC
77 West Jackson Blvd, C-14J
Chicago, IL 60604-3511
(312) 353-8917



MINNESOTA POLLUTION CONTROL AGENCY
MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

I. GENERAL INSPECTION INFORMATION

Site Name: <u>Alanco</u>	EPA ID Number: <u>MND 985 716 554</u>
Address: <u>1410 W. 9th Street</u>	Waste Activity: <u>LQG</u>
City: <u>Albert Lea</u>	Zip/9 Digit: <u>56007</u>
County:	District:
	Waste generated per month
Current Number of Employees: <u>95</u>	Years in Business or Date Company Started: <u>50+</u>
Date of last MPCA Hazardous Waste Inspection: _____	
Inspection Date: <u>10/18/05</u>	Time: From <u>10:10</u> to <u>1:00</u>

LEAD INSPECTOR:	Phone #
<u>Robert Dean Smith</u>	<u>312 886 7568</u>

Other People present: (name, title, organization)	Phone #
<u>Lane L. Vanek Manager, ENV.</u>	<u>507 373-1401</u>
<u>John L. Forman V.P. Sales/Tech Div</u>	<u>507 373-1401</u>
<u>Claire I. Vermedahl</u>	<u>507 373-1401</u>

Company Products or Services:

II. LICENSING/IDENTIFICATION/PERMITS

IDENTIFICATION - WASTE TABLE

Waste Name/Code	Quantity Generated in (last year)	Changes



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G1: Licensing / EPA / Permits

Rule	Requirement	Compliance Status	Remarks
7045.02 21	Has generator obtained a generator identification number?	IN	
7045.10 20 A	Metro Area – Does the generator have an approved license?	X	
7045.02 25 1	Outstate – Does the site have a current hazardous waste generator license?	IN	
7045.02 30 1, B	Outstate – Did the company include all hazardous waste streams on its license application?	IN	
7045.02 25 2	Is the generators license displayed in a public area at the licensed site?	IN	
7001.05 20 1, A	Does the generator operate as a TSD without a permit?	IN	

G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1, B	Is hazardous waste disposed of at a permitted TSD? (VSQGs can also deliver to a VSQG collection program site)	IN	
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?	IN	
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?	IN	Documents at the L90 day H.W. accum area



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/045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	1h	
7045.0568 3	If the company was unable to make arrangements with local authorities, have they documented the attempts?	X	



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G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1, E	Does the company comply with the POTW requirements for sewer hazardous waste?	/	
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction deterioration, operator error and discharges.	/	
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the company follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment.	/	
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	/	

G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)	IN	
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	IN	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	IN	
7045.0265 1, D	Are two-signature (generator) copies of manifests set to MPCA within 5 days of shipment date?	OK OUT	see notes - OK
7045.0265 4, A	Does the generator ensure that out-of-state facility copies get to MPCA within 40 days of acceptance by the facility?	OUT	see notes -

2 manifests



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G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	IN	<i>one manifest</i> <i>Alamo received manifest but MPCA did not get a copy until 10/18/05</i>
7045.0302 1	If company exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc.)	X	

G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 2	Does the company have a hazardous waste program director trained in hazardous waste management procedures?	IN	
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training programs?	IN	
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	IN	
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	IN	
7045.0558 6, D	Has the company kept records that document that the initial training and annual review training has been given?	IN	
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	IN	
7045.0558 6, A	Does the company maintain training records which include a job title for each position at the facility related to hazardous waste?	IN	
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	IN	
7045.0558 C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	IN	



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G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	IN	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to company personnel?	IN	
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders.	IN	
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	IN	
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment)?	IN	
7045.9566 4	Is emergency equipment tested and maintained?	IN	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc.)?	IN	
7045.0275 2	If the company had a release to the environment, did the company immediately notify the agency?	IN	
7045.0275 3	If the company has had a release, did the company recover as rapidly and as thoroughly as possible, any hazardous waste that has leaked, spilled, or otherwise escaped a container?	IN	

G1: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	IN	
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	IN	



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G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2) , item 8	e. For contaminated soil of which the company has applied alternative treatment standards has the company included the constituents subject to treatment, and the statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with the soil treatment standards as provided by 268.49 (c) of the universal treatment standard.	X	
268.7 (a), (3), (i)	For all hazardous waste that does meet treatment standards at the point of generation, has the company sent a one-time notification with signed certifications to the receiving TSD and kept a copy in its file?	1h	
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) , item 1	For all waste that does meet treatment standards, do notifications contain the following: a. All applicable EPA waste codes and manifest number?	1h	
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) , item 9	b. Certification statement	1h	
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4) , item 1 4	For waste or contaminated soil that are subject to exemptions, does the notification contain: a. All applicable EPA waste codes; b. Manifest number?	1h	



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G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4) , item 2 1	c. The date the waste was subject to the prohibitions?	M	
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4) , item 7	d. For debris being treated with alternative treatment standards, the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45?	X	
7045.1305 A	Is dilution used as a substitute for adequate treatment?	X	
7045.1380 2	Does the company have justification for storage beyond one year?	X	
268.7 (a), (8)	Does the company retain, on site, copies of initial notifications, certifications, and other relevant documents for a period of 3 years?	X	
7045.1315 1, D	For companies that treat prohibited waste in tanks or containers to meet treatment standards, is a copy of the waste analysis plan for this treatment on-site, and available to inspectors?	X	
7045.1315 1, D, 1	For companies that treat prohibited waste in tanks or containers, is the waste analysis plan based on detailed chemical and physical analysis?	X	
7045.1315 1, B,1,a	For waste treated in tanks or containers and then shipped off-site, do notifications and certifications contain: a. All applicable EPA waste codes?	X	
7045.1315 1, B,1,b	b. Treatability group (non-wastewater or wastewater) and subcategory (when applicable)	X	



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7045.1315 1, B,1,c	c. Manifest number?	X	
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G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) item 3	d. Constituents of concern for F001-F005, F039, and hazardous underlying constituents (not managed in a CWA or CWA-equivalent facility)? Note: This requirement does not apply if the waste will be treated and monitored for ALL constituents.	X	
7045.1315 1, B,1,d	e. Waste analysis data (where available)	X	
7045.1315 1, E	For generators that use "knowledge" to evaluate wastes, does the generator retain on-site all supporting data for waste determinations?	X	
268.7 (a), (9), (i)	For companies that are using alternative treatment standards for lab packs of hazardous wastes, has the company submitted on-time notification that contains EPA waste codes, manifest number and a one-time certification signed by an authorized representative?	X	
268.7 (a), (9), (ii)	Due to changes with the lab pack wastes, or receiving facility, has the company submitted additional notification and certifications, and kept a copy on-site?	X	

G1: Pre-Transport

Rule	Requirement	Compliance Status	Remarks
7045.0270 1	Prior to shipment, are hazardous waste containers marked according to US DOT hazardous materials regulations, including: the words "HAZARDOUS WASTE Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.", the name and address of the generator, and the manifest number?	M	
7045.0270 4	Prior to shipment, are wastes packaged according to US DOT hazardous materials regulations?	M	



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7045.0270 5	Prior to transport, have the applicable warning labels been placed on each package in accordance with US DOT regulations?	14	
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G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 1, A	Has the generator stored hazardous waste for more than 90 days beyond the waste accumulation start date?	IN	
7045.0292 1, C	Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?	IN	
7045.0292 1, F	Are hazardous waste containers and tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	IN	
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles and equipment?	/	
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	/	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	IN	
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?	IN	
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?	IN	
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?	IN	
7045.0626 6	Are incompatible wastes adequately separated?	/	
7045.0685 2, A	Are spent lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries?	/	



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G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0685 2, B,1	Are spend lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries AND is the containment area covered to prevent precipitation run on?	✓	
7060.0600 2	Has the company discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	✓	
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	OUT	marked "waste oil"
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	✓	
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	✓	
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	✓	
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	✓	

